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June 13, 2005

Office of Nutritional Products  
Labeling and Dietary Supplements (HFS-810)  
Center for Food Safety and Applied Nutrition  
Food and Drug Administration  
5100 Paint Branch Pkwy.  
College Park, MD 20740

JUL 13

Re: **Statements of Nutritional Support**

Dear Sir/Madam:

Please consider the following as notification of Statements of Nutritional Support as required under Section 403(r)(6) (21 U.S.C. 343 (r)(6)) of the Federal Food, Drug and Cosmetic Act and in accordance with §101.93 of Title 21 Code of Federal Regulations.

Manufacturer Name and Address: Geni Herbs  
1250 E. Conner Street  
Noblesville, IN 46060

<u>Brand Name of Dietary Supplement</u>	<u>Dietary Ingredient</u>	<u>Statement of Nutritional Support</u>
TinoFend	Tinosporia Cordifolia	"Immune-regulating principles." "Promotes immune response." "Helpful for promoting optimal immune response." "Maintains healthy immune response."
Bacognize	Bacopa Monnieri	"Promotes cognitive function." "Supports serotonin receptor regulation." "Supports healthy brain function." "Promotes healthy recall of logical material"

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		<p>and language comprehension.”</p> <p>“Supports memory recall.”</p> <p>“Enhances memory pathways/receptors.”</p> <p>“Supports healthy serotonin levels.”</p> <p>“Aids in neurological development.”</p> <p>“Plays a role in cognitive development.”</p>
WokVel	Boswellia Serrata	<p>“Regulates 5-lipoxygenase synthesis.”</p> <p>“Supports joint health.”</p> <p>“Promotes joint flexibility.”</p> <p>“Known to promote joint function.”</p> <p>“Known to maintain optimal joint function.”</p> <p>“Promotes increased joint function.”</p> <p>“Promotes increased joint flexion and mobility.”</p>
Calzbone	Cissus Quadrangularis	<p>“Promotes bone health.”</p> <p>“Promotes calcium absorption.”</p> <p>“Regulates calcium intake.”</p> <p>“Promotes healthy bones.”</p> <p>“Promotes optimal levels of bone mass density.”</p> <p>“Helps maintain bone strength.”</p> <p>“Promotes healthy bone strength.”</p>
PomElla		<p>“Maintains optimal cardiovascular health.”</p> <p>“Promotes healthy vascular function.”</p> <p>“Displays potent antioxidant activity.”</p> <p>“Contains potent antioxidants known to regulate oxidative stress.”</p> <p>“Helpful in maintaining healthy cholesterol levels already within the normal range.”</p> <p>“Helpful in maintaining optimal cardiovascular function.”</p>

The information contained in this notice is complete and accurate. The above manufacturer has substantiation that the statements are truthful and not misleading.

Sonya Cropper

Sonya Cropper  
Geni Herbs